

# Representations to the Rother District Council Local Plan (2020-2040) - Regulation 18 Consultation

On behalf of Kingacre Estates

July 2024

## Introduction

1. These representations have been prepared by Nexus Planning on behalf of Kingacre Estates in response to the Regulation 18 consultation of Rother District Council's Local Plan ("the Draft LP").
2. Kingacre Estates has an interest in Land to the south of the Broad Oak Public House, Broad Oak ("the Site") which is allocated by Policy BRO2 of the Council's Development and Site Allocations Local Plan adopted in December 2019 ("the DaSALP") and, therefore, has an interest in all strategic and non-strategic matters informing the preparation of the Draft LP.
3. The Site is allocated in the adopted Local Plan for 20 dwellings and the northern parcel of land gained planning permission (ref. RR/2018/1813) for 8 dwellings in March 2020. This has now been implemented and completed. The southern part of the Site remains undeveloped but is available for development.
4. These representations specifically respond to Question 65 of the Draft LP - "What are your views on the vision for Rye and the network settlements?"

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5. Paragraph 5.8 of the Draft LP confirms that the most appropriate spatial development options to take forward as Rother's proposed development strategy is a combination of the following options:
  - a. Brownfield intensification and redevelopment within sustainable settlements (Option reference SDO6);
  - b. Bexhill greenfield growth on the northern and western edges of the built-up area of Bexhill to create new compact, connected communities (SDO3A);
  - c. Hastings Fringes urban growth (SDO5);
  - d. Radial settlement network connected to Bexhill and Hastings (SDO2);
  - e. Village clusters centred around Rye and Battle (SDO1); and
  - f. Sustainable settlement growth (SDO4) with longer term, a focus on the A21 Corridor (SDO10).
6. The Development Strategy Background Paper (April 2024) describes option SDO1 (Village Clusters) as a cluster of villages that are connected with each other to form a sustainable community. One of the clusters identified is centred around Rye and includes the village of Broad Oak.
7. The Vision for Rye and the Eastern Settlement Cluster sets out that:

*"The eastern cluster of settlements will be better connected by sustainable transport infrastructure, with Rye acting as a key transport hub, and local economies will continue to grow, respecting the historic development*

*pattern of rural communities over time. The strengthened connections to Rye as a sustainable market town, will allow for sensitive development in adjoining villages.”*

8. Section 2 of the Framework considers achieving sustainable development. Paragraph 7 states that:

*“The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.”*

9. Paragraph 11 discusses the presumption in favour of sustainable development and states that:

*“For plan-making this means that:*

- a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.”*

10. Kingacre Estates supports the Council in seeking to address the sustainable longer term strategy for villages in rural locations. It is key to address the need for housing within the rural areas in line with spatial objective 4 of the Draft LP, however, this needs a strategic approach which directs residential development to those villages in close proximity to nearby towns, such as Broad Oak, where sustainable transport options, including bus stops (providing regular services to Robertsbridge, Westfield, Peasmarsh, Mountfield and Battle), and services and facilities, such as a primary school, convenience store, bakery and public house are all available. Broad Oak is demonstrably a sustainable location for development.
11. It is clear that in its spatial strategy, the Council has had regard to encouraging development in locations with strong access to key services and facilities, and sustainable travel connections, which accords with paragraphs 7 and 11 of the Framework, as well as spatial objectives 1, 7 and 9 of the Draft LP.
12. The Council’s Sustainability Appraisal presents an assessment of the available sites in the district for development, and this has informed the Council’s overall spatial strategy. It is worth noting that the Site is identified as an available site and scored highest, out of the seven sites located within Broad Oak, against the 20 Sustainability Appraisal Objectives.
13. The Site is within the settlement boundary of Broad Oak and comprises a suitable location for sensitive development, in line with the Council’s vision for the eastern settlement cluster. This is emphasised through its residential allocation within the current DaSALP, where the Site was found to be a preferable location for development.
14. The Site is rightly identified in Figure 28 as a Site currently allocated in the DaSALP. The Site is suitable, deliverable and developable and we recommend the Council retains existing, currently undeveloped allocations within the emerging Local Plan, as a minimum before looking at alternative sites, making sure that the development management process, and any emerging policy allocations, respond positively to any changes in circumstance on the ground that have taken place since site allocations were originally made, thereby ensuring that existing unbuilt allocations remain deliverable in full.
15. Kingacre Estates supports the Council in directing strategic development towards sustainable locations within the rural areas, particularly Broad Oak, and considers that the Site is a suitable location for development. Kingacre Estates urges the Council to rollover the existing allocation of the Site in order to support spatial objectives 1, 4, 7 and 9 of the Draft LP.

## Conclusion

16. Kingacre Estates welcomes the Council's engagement in the plan-making process and supports the approach taken by the Draft LP in seeking to deliver strategic development within sustainable settlements in the rural areas.
17. Land to the south of the Broad Oak Public House aligns with the Vision for Rye and the Eastern Settlement Cluster and the spatial objectives of the Draft LP as it would:
  - a. Deliver a residential development within a suitable and sustainable location within the rural area (in accordance with Draft LP spatial objectives 1, 4 and 7);
  - b. Ensure development is accessible and located within close proximity to sustainable transport (in accordance with spatial objectives 1, 7 and 9);
  - c. Provide housing to meet local needs and affordability issues (in accordance with spatial objective 4); and
  - d. Address the short-term housing needs of Broad Oak through its capacity to come forward quickly and provide a meaningful contribution towards delivering the housing needs of the district (in accordance with spatial objectives 4).